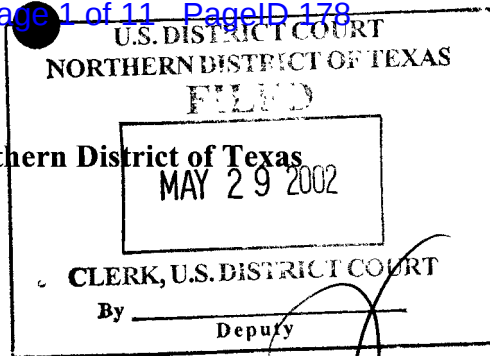


MTJ  
ORIGINAL

In the United States District Court for the Northern District of Texas  
Dallas Division



(USA and )  
Jamal Elhaj-Cehade  
Co- plaintiff

Vs.  
01301-L

Educational Commission for Foreign Medical Graduates  
Et al entities and individuals) Defendants

- 1- Plaintiff's notice of appeal before a USDC District Judge of the Magistrate judges orders( and motion to proceed IFP if Needed)
  - 2- The plaintiff motion for summary judgment and preliminary injunction with brief in support.
  - 3- Plaintiff list of evidences( motion to admit)
- May 28, 2002

Comes now this should serve as the plaintiff notice of appeal of the Magistrate Judges orders( interlocutory) before a District Judge as follow attached to the plaintiff's motion for summary judgment with brief and the plaintiff notice of evidence and citation:

**Jurisdiction statement**

The USDC court judges do have the jurisdiction and power to hear appeal from Magistrate judges orders. The plaintiff did file a notice of appeal before a USDC judge for the orders rendered in the case 3:99-CV-680-D/BC By MG judge Boyle. The plaintiff requested the consolidation of the proceedings.

**Introduction**

1-Both Magistrate judges erred in their decisions. In the case 3:99-CV 680-D/BC the court proceeded before a Magistrate judge without a valid consent on the part of the plaintiff( consent **under duress and intimidation and threat of retaliation**). And in this case 3:01-CV-1301-L the court forwarded all the proceedings to the Magistrate judge, without the plaintiff consent and against the plaintiff's will. Therefore all the orders are void, null and lack any validity. They are done under the influence and highly unconstitutional.

2- In addition On April 11, 2002, at 1:03 PM. **The defendants attorney admitted to the long existing EX-Parte communication between the ECFMG defendants and the court.** The plaintiff demanded that any unfavorable order against the plaintiff must be done **SOLELY** after a hearing in the courtroom before judges and in which the Plaintiff and the defendants( attorneys) are BOTH present to clarify and dispute any misunderstanding where the plaintiff does have a pile of evidence to prevail in any argument.. the plaintiff further asserts and for the last time that any order done

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otherwise will be deemed as EXPARTE Communication and those orders are deemed void and lack of Validity and must be vacated immediately. The plaintiff also filed motion for removal of judges if they do not comply with the request. The plaintiff is hereby reaffirming his request and for the last time he is asking the judges to kindly withdraw from the case if they are not willing to conduct a hearing in the presence of the plaintiff. The plaintiff's requests are **absolutely** justified: The defendants attorney admitted to the exparte communication, the court conduct is questionable since 1997, and there are millions of dollars unaccounted for ( see explanation in details) that finance the defendants underground and politically motivated operations, and to the facts that the defendants to the hundreds of thousands of dollars in questionable legal fees each year( see ECFMG admitted to 709 thousand US\$ or more in 1999 in exhibit A2 line 32). The matter lies with the defendants not with the plaintiff. The plaintiff reaffirms the existence of EX-Parte communication until proven otherwise by the conduct of the court, and the plaintiff rejects the language of threat against him, and the plaintiff may go public before the media if necessary and he may take further actions and request compensation from the defendants attorneys and the judges for their indulgence. The plaintiff holds the judges and the defendants attorney personally responsible should the matter reach the boiling point of no return. The defendants ECFMG do have a duty to identify and meet the plaintiff' NEEDS and maximize his benefits( exhibits A-5 paragraphs 1 and 3 and all, exhibit B1, exhibit A7). The plaintiff will stop only when his NEEDS are met and his benefits are maximized. And the sooner the better. The burden lies with the defendants( and their attorneys) and with the judges.

### **Plaintiff's Statement**

In order to reduce the cost of litigation and enhance the efficiency of the administration of justice, the plaintiff is joining his motion (+ brief) for summary judgment along the( interlocutory) appeal before a USDC judges. The motion will serve also as a response to the Magistrate judge claims: the plaintiff asserts that his claims have MERIT, the plaintiff's NEEDS must be met and the legal NEEDS take preference and priority. *The defendants have proven to be unfit to identify and meet the plaintiff's NEEDS* and they made their language clear of their willingness **to take advantage of the plaintiff**( being a pro-se). therefore the defendants are not engaging into identifying the plaintiff's NEEDS as obligated( and much less meeting those needs). Taking advantage of the plaintiff is not a way to identify and meet the plaintiff's NEEDS. Also the plaintiff do certify that all his statements and evidences and copies are true under penalty of perjury and that the plaintiff use of the defendants 1999 tax filing to be used as an evidence for the same argument for any other year of period 1994-1999. in other word the plaintiff could have used the tax of any year 1994-1999 such as 1997 and the plaintiff still reach same conclusion. However the 1999 year has the advantage of reducing the lengthy arguments being recent( the use of 1999 tax as a prototype for other years)

### **FACTS**

1-The defendants ECFMG admitted to the US Government their income tax filings ( Exhibits A-5 and A-7) that the ECFMG does have a duty a to identify and assess the plaintiff NEEDS( the plaintiff is one of international Medical Graduates) and to meet those needs. Therefore the defendants ECFMG admitted to the following:

- A- The defendants do have a **life-term** duty to *identify* and *assess* and *meet* the plaintiff's NEEDS. ( Contract, obligations, duties and conducts and programs)
- B- The defendants admitted to be subject to the rules and laws governing their exempt status and the terms for which they acquired such status.
- C- The defendants admitted to the **linkage**( links) between their status as exempt on one side and the meeting the plaintiff's NEEDS on the other

2- the Plaintiff is a **US Citizen** therefore he is a part of the *public*, he is a *consumer* of healthcare and he is a potential *provider* of healthcare. The plaintiff has a part of his medical education done overseas( *FMG*) and he is a *part of the International Medical Education( FMG/IME)*.

- 4- the plaintiff does NOT exist because of the defendants, but the defendants were created to serve and help the plaintiff and meet his needs.

4-The violations of the defendants are still **ONGOING** for which *reliefs* must be **granted**.

**5-This case is a civil case, FRCP rules: preponderance of evidence + evidences must be viewed as most favorable to the plaintiff side.**

### **Arguments**

the defendants admitted to owe the plaintiff a **life-term obligation** to *promote* his excellence( exhibit B1) and his *advancement*( exhibits A-7 and B-6) and to *serve his interest as a public*( exhibit A-7) and promote his cause *and maximize his benefits* and *expand his opportunities* ( Exhibit A-7) and or by/ to *identify* the plaintiff's NEEDS and *meet* them appropriately( exhibit A-5) and to *disseminate the useful information and assistance* to the plaintiff that **meet his needs**( exhibit A-5).

- 1- The plaintiff asserts that the *defendants failed* to meet the plaintiff's NEEDS, they did not promote any advancement or excellence. The defendants made their language absolutely clear both in words and actions and conducts of their *intentions of not to identify* the plaintiff's NEEDS and meet them. These fact are further evident by the facts that during the plaintiff litigations the defendants did not show any GOOD signs of adequately identifying the plaintiff's NEEDS and meeting them. The defendants have transformed a small matter into a big one, and they have shown their readiness and willingness to **take advantage of the plaintiff** as a pro-se se by using the money( that were supposed to be used to advance and meet the plaintiff needs) to hire an army of attorneys with big guns and to influence the courts in an unbelievable and shocking manner that do not meet the plaintiff's NEEDS. In addition, the

defendants deliberate violations are self explanatory and still **ongoing**. Therefore judgment must be rendered into the plaintiff's favor.

3-The defendants admitted by words and actions to all the charges brought against them: The defendants admitted to every element of every claim brought against them. The defendants never fulfilled their obligations toward the plaintiff and they admitted to such repetitively **and arrogantly**( breech of contracts, unjust enrichment at the expenses of the plaintiff's NEEDS, deceptive trade practices, profiling, **retaliation**, fraud, deceit and scams, price fixing, deprivations of life, opportunities, works, preventions of his excellence and advancement, etc..)

- 5- the defendants have been arrogant in their violation and they violate the laws arrogantly as if they are above the decency of the laws
- 6- the defendants did not identify / assess nor meet the plaintiff NEEDS. The defendants failed to identify the plaintiff's NEEDS in his previous litigations and the defendants changed or transformed the plaintiff's NEEDS for which they are liable. All the plaintiff's problem could have been prevented if the defendants adequately and properly identified the plaintiff's NEED and met them.
- 7- the defendants now are refusing to identify the plaintiff's NEEDS( retaliation)-Ongoing practice.
- 8- The defendants failed to meet the plaintiff's NEEDS. All the defendants activities and practices do not constitute meeting of the plaintiff's Needs( delays, discriminations, refuse to assist and help, profiling, and subjecting the plaintiff to the lack of protection of the law, retaliation, price fixing, deprivation of any meaningful access to the court and justice, various deprivations and opportunities etc...). the matter is self explanatory
- 9- The defendants violations of the US laws does not constitute a plaintiff needs
- 10- The defendants failed to abide by the rules governing 501-C-3. The defendants failed to invest a **minimum requirement of sixty percent** of their gross income(before any deductions or expenses) on the cause for which they are created( **meeting the plaintiff's needs and maximizing his benefits and expanding his opportunities**).
- 11- The defendants stole/concealed/or diverted the funds that were supposed to be used to help the plaintiff by identifying and meeting his NEEDS(exhibitsA-5, A7, B1-6.) for example, the defendants **fraudulently** claimed expenses as examination refunds( exhibit A-4 and A6). The refunds( expenses) were never made and the money was channeled into mysterious accounts and practices that do not meet the plaintiff needs. Beginning 1994 and until the year 2001, The defendants adopted a policy of **no examination refunds** ( Exhibit B2 and B3), therefore the defendants

expense ( in exhibit A-4 and A-6) are fraudulent against both the plaintiff and the USA. The defendants committed such violation every year 1994-2000.

- 12- The defendants admitted to generate gross incomes at least from the following sources: a- requests of examinations; b- acting as a placement agency ERAS( exhibits B4 and B5); c- Funds Generated from SIX major sponsoring organizations; d- Matched and unmatched funds and benefits from Governmental, public, and private sources; e- from verification process (other than residencies) and visa sponsorship( exhibits A-2 and B4); f- from investments returns as interests and investments and equities in Bonds and stocks and securities etc.( exhibit A-1 and page 6 of ECFMG tax form); g- other miscellaneous sources.

Since the defendants must use a significant part of their Gross incomes( minimum 60%) to assess and identify and meet the plaintiff needs and expand his opportunities and maximize his benefits( exhibits A5 and A7) . The defendants stole his prosperity by **not disclosing their full gross income** on their tax returns. Their hiding of funds also constitutes *deceit and fraud and malice and scam and retaliation and unjust enrichment at the expense of the plaintiff needs*. Furthermore, the defendants lack of disclosure of full income constitutes fraud against the US government( tax). And since the missing money were used to both violate the plaintiff rights and to violate major US laws. Their violations were directed both at the US and the plaintiff. The plaintiff explanation is as follow:

*On September 8, 2000*, the defendants admitted in their motion for summary judgment with brief in support and appendix( see Dr Chehade vs.ECFMG in 3:99-CV-680-D/BC record pages 426-D or APP 010 and 422) admitting to be non-educational, and admitting to the sales of a **minimum 63 thousands** examinations requests every year of the period 1994-1999){ note : the defendants admitted to a higher figures in examinations taken in their yearly annuals reports) . Therefore the defendants admitted to the following: the defendants usage of its name Educational is a fraudulent and deceptive( exhibit A-7 at ECFMG Bylaw Article 1, sections 1 and 3 and 4>) and they also admitted to use the name of educational as to fraudulently acquire public benefits and exempt as non-profit( see below, and see exhibit D1 and D2 the ECFMG demanding its profits).

For example, In 1999 the ECFMG estimated Gross income should be near 200 Millions US\$, but the defendants admitted to a less than 30 Millions( Exhibit1, line 12). Every year there is money missing as follow:

#### **Explanation:**

1-In 1999, the price range for requests( sales, examinations) is of the following types: ( a-minimum 685 US\$ per request for half part; or b- and 1370 US\$ for a part; or c-and 1200 US\$ for CSA; or d- and 2570 US\$ for full package; and e-and ADDITIONAL 250-500 US\$ for outside the United States delivery). therefore Assuming all the 63 K requests were of minimal type done inside the U.S.A.( 685



US\$). Therefore the minimum income generated would be: 685 US\$ multiplied by 63000= 43,155,000.US\$ or roughly at least 43 million dollars must be declared as minimum from exams requests alone which is higher than the total Gross income( 29 Million) from **all sources** as listed in the defendants income Tax( exhibit A1 line 12).

- 2- the defendants also stole/concealed money generated from the ERAS source and engaged in price fixing schemes: the *defendants act as a placement agency* under ERAS ( exhibit A2) for 30 thousand jobs each year( exhibit B5). The number of estimated participants usually exceed the number of jobs because all jobs were filled by one person.

Again , Assuming that all income from ERAS was done under minimal condition in which each applicant files only one application and get it( like on bullet one hit or--one job one applicant one application) . therefore the minimal number of applicants would be 30 thousands. The minimum price for ERAS in 1999 was 105 US\$( 75 US\$ Token fee and 30 US\$ processing fee) **see exhibit B5** for the current fees of 135 US\$( 75+60). The income generated under ERAS would be a Minimum of 30000 multiply by 105= 3,150,000US\$ . the defendant admitted to only half of that amount of 1.5 Million. And every year the matter cumulates to become **a serious money**.

- 3- The defendants failed to disclose their income generated from their SIX major sponsoring organization but if each contribute something( usually in millions) , it must be multiplied by six to add up every year.

- 4- The defendants failed to disclose the income generated from matched and unmatched funds from governmental, public and private sources, every year...the matter is self explanatory....

It becomes clear that when income generated from visas sponsorships and from verification of credentials and from other types of placements . **the amount of money missing increases as the Gap widens.**

The money is gone and so the plaintiff benefits.

- 5- the defendants failed to use the *minimum of sixty percent* of their declared income of 30 millions and the matter is self explanatory. To make the matter worse, the defendants promoted the placement of people with visas ( exhibit 2) displacing the plaintiff and many other US Citizens doctors eager to have their licenses to serve their communities. Such placement of visas serve a political agenda for an underground activities within the ECFMG organization, the aim is to limit the number of practicing doctors and price fixing in the United States. Subsequently, The plaintiff suffered injuries as a **potential provider**( displacement practice), and as a **consumer**( the plaintiff cannot afford the care he NEEDS- plaintiff's needs- and he was unable any full time job because of the rising costs of benefits), and as a **public**( the plaintiff was subjected to profiling, harassment, alienation, taxpayer, lack of harmony, and he lost faith in everything called : justice; black robes where the laws are not worth the ink and where the blood shed protecting the constitution has no meaning; and anything called non-profit/charitable organizations for their scams ) and it will take a miracle and hard work and real physical evidences to heal the plaintiff wounds.

### Plaintiff's claim

The plaintiff asserts that the defendants **admitted to every element of every claim** brought against their **ONGOING VIOLATIONS** that must cease immediately.

The plaintiff also asserts that any hearing without the plaintiff's presence in the court room constitutes an Exparte communication between the defendants and the court and that any order done is deemed void , null and invalid and the plaintiff asserts that evidences speak for themselves that judgment must be into the plaintiff's favor. And that should additional evidences and inquiries be requested the plaintiff does have plenty.

The plaintiff asserts that any order done without meeting the plaintiff legal needs as a pro-se is considered as evidence against the defendants for future lawsuits. The defendants and their allies in court must understand **that AS LONG AS THE PLAINTIFF'S NEEDS ARE NET MET AND HIS BENEFITS ARE NOT MAXIMIZED**, the plaintiff will continue in his fight even it is will become a personal matter with attorneys and the judges. The defendants created the matter and they should fix it.

2- On April 11, 2002 at 1:03 PM, the defendants attorney admitted **ARROGANTLY** to the long **existing Exparte communication between the defendants and the court** that alter all the proceedings. In fact since 1997, the Judges were acting like Cheerleaders to the violations of the defendants( and their hired guns attorneys). The plaintiff raised the issue of exparte communication and demanded that no court order be entered against the plaintiff without the full and proper hearing in the courtroom and in the presence of all parties. The plaintiff stated that any order rendered outside such condition is deemed null, void, and lack of validity as done under the influence. The plaintiff reasserts his claim of Exparte communication between the court and the defendants, and the plaintiff claim is extremely justified because of the **pattern** of conduct of the court. US Citizens do have the constitutional right to criticize the conduct of public officials( judges). The plaintiff wishes to have reasons not to think otherwise but the nature of the defendants is to blame. The defendants can cause the USDC judges to smell the cooking on the MOON. For example, the defendants accused two doctors of cheating from each other, and the defendants were able to hide the court records as usual( the matter is obvious: how it could be possible to cheat on exams where the two doctors took their different examination in two different cities and in different times. In addition , every examinee has a different sequence or set of questions, and there is no time to do so- 40 seconds per question). Therefore the plaintiff is reaffirming his request to have a hearing conducted in the courtroom in the presence of both the plaintiff and the defendants before any adverse order to the plaintiff. **Such fact will save time, money and duplicate work. And eliminate any misunderstanding and if the court does have a question the plaintiff will answer on the spot. And it will have reduced this lengthy explanations required by the use of small demonstrations that tell it all.**

3- the plaintiff rejects the court claim that the defendants do not have a merit or evidence. The plaintiff requests to have his NEEDS assessed and identified and met

were directed to the defendants ,not to court. It is the defendants duty to identify and assess the plaintiff NEEDs and meet them. The plaintiff's request was for a hearing to see why the defendants are refusing to do so.

4- the orders were entered before the plaintiff's NEEDs as pro-se are assessed and met. The court must understand that evidences speak for themselves. The defendants are taking advantage of the plaintiff. And to take advantage of the plaintiff is not a proper identification and assessment to meet the plaintiff's NEEDS.

5- The plaintiff asserts that the Magistrate judge language of threat prove to the existence of plaintiff needs that must be met.

6- IT does not need a rocket scientists to see what the defendants are doing, evidences are self explanatory.

**Brief in Support of the plaintiff's motion and explanation of the attached documents:**

*The plaintiff's asserts that the evidences are self explanatory: defendants failed to identify the plaintiff's needs and meet them and the matter is still ongoing. The plaintiff legal needs must be taken care of first before any order, anything less constitute misidentification of the plaintiff's NEEDS and Gross failure to meet them and violations of the concept of maximizing the plaintiff's benefits. The plaintiff does have legal claims That anything the defendants are part of( including litigations) must identify and meet the plaintiff's need and maximize his benefits. In addition, the defendants proven to be unfit to assess and meet the plaintiff's needs and they made their language clear. Therefore the plaintiff is entitled to end the ONGOING violations by having this court render judgment into his favor. Below is explanations pertinent to the exhibits attached under A(1-7), B(1-6),C( 1-6) and D(1-2) as Follow:*

**Exhibit A1:** Page 1 of the 1999 tax filing of the defendant ECFMG: showing the **disputed** ECFMG Gross income, and income from investment

**Exhibit A2 :** page 2 of the defendant 1999 income tax: showing the disputed legal fees, and the disputed interests as expenses(??!!): and defendants acting as a placement agency for visa holders.

**Exhibit A3:** Page 5 of ECFMG 1999 tax file, showing the signature of Dennis Donahue( ECFMG official)

**Exhibit A4:** Statement 2 of the ECFMG 1999 tax form showing the Disputed expenses as examination refunds ( see Exhibits B2 and B3) and A6.

**Exhibit A5:** Statement 3 of the ECFMG 1999 tax file, showing the duties and Obligations linked to the ECFMG exempt status

**Exhibit A6:** Statement 8 of the ECFMG 1999 Tax files, showing expenses as examinations refunds(?), see also B2 and B3

**Exhibit A7:** first page of three of the ECFMG bylaws showing the defendants Bylaws Article I. Name and purpose. It is a part of the ECFMG



1997 tax files.

- Exhibit B1** : the front cover of the defendants public directory in 1997,  
Showing the ECFMG of obligation toward the plaintiff to promote  
the excellence of his IME.
- Exhibit B2**: is a page 2 of the Exhibit B1, showing that no examination refunds  
allowed as expense, see also B3 and A4 and A6.
- Exhibit B3**: is a page 17 of Exhibit B1, showing no refund policy. See B2, A4  
and A6
- Exhibit B4**: self explanatory from ECFMG website; showing that whenever the  
plaintiff request job and submit his resume. It is what the defendants  
ECFMG words that count and determine the plaintiff's fate.( note: the  
defendants repeatedly denied the existence of such practices). It  
also explains how the plaintiff's resume were not considered.
- Exhibit B5** : another official document from the defendants WebPages showing  
the defendants acting as a placement agency and as a source of  
revenue( the defendants repeatedly denied its existence).
- Exhibit B6**: an official WebPages of the defendants ECFMG showing their  
obligation to promote the advancement of his IME
- Exhibits C1 and C2**: a two-page public WebPages document and statement  
Signed by Dr Badri ( Badralsadat) Madani showing she was  
sued by the defendants ECFMG and expressing her  
concerns. See case 6:99-1676-24 in exhibit D1 and D2,  
and see the Statement of Dr Daniel Klage in his website in  
C5 and C6
- Exhibits C4 and 5**: Dr Daniel Klage main WebPages public document  
expressing his experience with the defendants ECFMG
- Exhibits C5 and C6**: Dr Daniel Klage sub page under Free-Speech, taking about  
the experience of Dr Badri( see C1 and C2) and the events of  
how the ECFMG shut down Dr badri site. See also D1 and D2
- Exhibits D1 and D2** : pages 1 and 20 of the ECFMG initial complaint in their  
lawsuit against Dr Badri Madani. The ECFMG admitted to  
be for profit to the level of treble.- it show also that the  
ECFMG can manipulate the justice system and claim to  
be non-profit only for the sole purpose of benefits as  
exempt. See also all other exhibits attached
- Plaintiff CERTIFICATE AND OATH**: the plaintiff do hereby certify and under  
the penalty of perjury that all the documents and statements and exhibits attached or  
non attached are true and correct to the best of the plaintiff and that the plaintiff  
signature at the end of the plaintiff service should be considered as a signature for  
each document submitted.

## CONCLUSION

the defendants admitted to everything when they refuse( failed) to identify and  
meet the plaintiff NEEDS. The defendants made their language clear of their  
**intention to take advantage of the plaintiff** by hiring high caliber GUNS attorneys

and being able to have a team of cheerleaders in the court room. The evidences are self explanatory that the defendants did not identify the plaintiff needs or met or maximized his benefits as obligated.

The judges must understand the plaintiff's position and the Ongoing hell raised against him by the defendants for sometime. Evidences against the defendants are clear, and added to be viewed under FRCP that evidence must be viewed as most favorable to the plaintiff's side. The evidence add up to render a judgment into the plaintiff's favor without any reluctance. The defendants admitted to every element of every claim brought against them.

The defendants violations are so numerous and so broad that make it impossible to argue all of them in writing and in this motion and justifies the plaintiff request for oral hearing in the courtroom in all parties presence...

The matter must be brought to an end by having the plaintiff's NEEDS met immediately his benefits maximized. The sooner the better. The defendants failed to answer to the plaintiff requests. The matter is self evident, the **plaintiff is moving this case for a summary judgment into his favor.**

#### **Demand**

Wherefore premises considered, the plaintiff prays that upon proper hearing( all parties present) before judges and **jury**. The court render its judgment in favor of the plaintiff, or upon proper hearing in which the plaintiff's evidence satisfies the court as evidences are self explanatory against the defendants thereby the court renders judgment against the defendants into the plaintiff's favor and to allow both the plaintiff,( and the Us Government) to be awarded their full reliefs and to meet the plaintiff's NEEDS and maximize his benefits.

The plaintiff further demand that all the ECFMG ongoing violations must stop immediately and if such matter is impossible then the defendants operation cease to exist. its assets be awarded to the plaintiffs for liquidation.

**Certificate of service and conference:** this is to certify that this filing was done after plaintiff's call of the defendants attorney Mark Robert and left a message on his voice mail at 4:45.PM Monday May 27, 2002 , and after the e-mail sent On Tuesday May 28, 2002. and that a true copy of the foregoing and their attached documents and exhibits and statements that the plaintiff certified them under penalty of perjury as true , all of which were sent to the defendants attorney MRS Susan Schwartz/ Mark Roberts at their address of record via USPS regular prepaid mail on May 29, 2002 to the address 6688 N Central Expressway# 850, Dallas, Texas 75206-3913. the plaintiff also sent a copy of this filing via email to the defendants attorney on the same day.

Respectfully submitted

Dr Jamal Elhaj\_chehade, pro-se( tentatively), plaintiff

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attached are the exhibits A1 through A7  
and exhibits B1 through B6  
and exhibit C1 through C6  
and exhibits D1 through D2

Plaintiff's signature

A handwritten signature in black ink, consisting of a series of loops and a long horizontal stroke, positioned to the right of the text "Plaintiff's signature".